

## **CC Docket No. 94-102 – Status Report**

**Filed by:** Keystone Wireless, L.L.C.  
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**Date:** February 1, 2007

**To:** Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**By Electronic Submission:**

Catherine W. Seidel, Acting Bureau Chief  
Wireless Telecommunications Bureau  
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**STATUS REPORT**  
**Due February 1, 2007**  
**CC Docket No. 94-102**

Keystone Wireless, L.L.C. ("Keystone") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

**Carrier Identifying Information:**

**Carrier Name:** Keystone Wireless, L.L.C. – FRN 0007 4157 06

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**Information Regarding PSAPs:**

Since the submission of its last Status Report, Keystone has received no new Phase I or Phase II E-911 requests from any PSAP in its market. To date, Keystone has received a total of seven Phase I requests and eight Phase II requests. Keystone has completed the installation of its Phase I deployment in Lycoming County, and is currently working to complete the Phase I deployment in Montour County. Additionally, Keystone is continuing to work with the PSAPs in Clinton County, Northumberland County and Snyder County to schedule and deploy Phase I E-911 implementation in their respective counties.

Keystone has engaged Essential Management Services, LLC ("EMS") to secure funding from the state of Pennsylvania, but as importantly to interface with the various PSAP's and to keep them informed of Keystone's activities with the state regarding funding. EMS also keeps Keystone up to date on the status of the PSAP's and their deployments. Keystone, in conjunction with EMS, continues to keep all of the requesting PSAPs updated on the status of its implementation plans for Phase II E-911, and to provide each of them with copies of all related submissions to the Federal Communications Commission. Keystone and EMS are maintaining regular contact and phone calls with Kimball & Associates, which represents the PSAPs for the counties of Center, Clinton, Lycoming, Montour and Northumberland; Keystone continues to maintain its contact, through Intrado, with the Schuylkill County

PSAP; and is continuing its direct communications with the Berks County PSAP director. To date, none of these PSAPs has expressed any concerns or issues respecting Keystone's Phase II E-911 implementation efforts.

### **Implementation of Phase II Service:**

Keystone previously reported that it has been exploring various Phase II E-911 network-based solutions. Keystone continues to monitor the market for new products or modifications to existing products that might potentially serve as a viable and affordable Phase II solution for Keystone's market.

Keystone cannot implement any known Phase II E-911 solution until it is able to secure financing. As previously reported, Keystone has entered into a contract with EMS whereby EMS will assist Keystone in initiating the Phase I cost recovery process with the State of Pennsylvania, and to seek funding for Phase II E-911 deployment. EMS is currently assisting Keystone with the preparation of the funding request to be submitted to the State during the annual filing window, and Keystone expects to file such a request with the assistance of EMS in April of this year. The State will notify Keystone in July of this year of its decision either granting or denying Keystone's request for reimbursement for its Phase I deployment and potentially funding for Phase II E-911. While continuing to pursue funding via EMS, Keystone also continues to explore other financing options. Once Keystone has secured funding for Phase II E-911 from the state or other sources, Keystone will immediately move forward with deployment plans.

### **Construction of New Cells and Expansion of Coverage:**

Since its last Status Report, Keystone has upgraded two more of its existing cell sites in its market, such that they each now have a larger coverage area. Keystone has constructed one new cell site in its market, which gives Keystone coverage of an area in which it previously had no coverage.